

# EXHIBIT 1

LAW OFFICES OF  
ROBINSON, CALCAGNIE & ROBINSON

SAN DIEGO OFFICE  
110 LAUREL STREET  
SAN DIEGO, CALIFORNIA 92101  
(619) 338-4060 - (858) 456-0900

ORANGE COUNTY OFFICE  
620 NEWPORT CENTER DRIVE  
SEVENTH FLOOR  
NEWPORT BEACH, CALIFORNIA 92660  
(949) 720-1288  
FACSIMILE (949) 720-1292

Reply To: Newport Beach Office

June 8, 2010

By U.S. Mail & Email

Vincent Galvin, Jr., Esq.  
BOWMAN AND BROOKE LLP  
1741 Technology Dr. #200  
San Jose, CA 95110  
vincent.galvin@bowmanandbrooke.com

Cari K. Dawson, Esq.  
ALSTON & BIRD LLP  
1201 W. Peachtree Street  
Atlanta, GA 30309  
cari.dawson@alston.com

Lisa Gilford, Esq.  
ALSTON & BIRD LLP  
333 S. Hope Street, 16th Floor  
Los Angeles, CA 90071  
lisa.gilford@alston.com

Re: *In re Toyota Motor Corp. Unintended Acceleration Marketing, Sales Practices, and Products Liability Litigation*

Dear Counsel:

We promised you a letter that sets forth Plaintiffs' proposals for the categories of discovery that Plaintiffs will propound to the Toyota defendants and their vendors initially in this case. This letter sets forth a general description, for discussion purposes, of the discovery Plaintiffs will initially seek from Toyota and third parties. This description is without prejudice to any modifications or additions to the description of the discovery Plaintiffs may seek. We look forward to discussing our planned discovery with you and hearing your views regarding discovery. Plaintiffs would recommend a streamlined method for resolving any discovery disputes that may arise during the course of the litigation, including presenting issues to the court or the discovery masters for resolution based on short letter briefs. Separate discovery requests will be directed to the US Toyota and third party companies and the Japanese (and other foreign) Toyota and third party companies.

This discovery will include very early PMK depositions, requests for production of documents, interrogatories, and key Toyota TMC/vendor and Toyota USA/vendor employee depositions.

The purpose of the PMK depositions will be to help Plaintiffs identify relevant categories of evidence in this case including all persons, documents, databases and vendors that relate to all aspects of this case. Such depositions will also aid in the early and proper identification of defendants.

The very early PMK depositions for Toyota Japan/vendors and Toyota USA/vendors will be used to help Plaintiffs understand the nature of the various Toyota organizations, interactions and communications to all dealers; and all issues in this case relevant to the Electronic Throttle Control Systems (hereinafter ETCS) for all subject Toyota vehicles in this case. This includes but is not limited to: design, engineering, testing, schematics, drawings, component parts, all relevant databases, all Failure Mode and Effects Analyses, quality control and assurance, defects surveillance, Tread Act data, early warning information regarding Unintended Acceleration events (hereinafter UA); the identity of relationships and relevant documents that pertain to vendors such as Denso, Mitratech's TeamConnect and all other relevant vendors; Toyota sales, marketing, advertising, warranty claims, Technical Service Bulletins, changes, revisions, modifications, recalibrations, etc. In addition, another PMK deposition category will relate to any and all communications, contacts, interactions, contracts, and any other potential nexus or control with or over any and all Toyota dealers. We would expect to begin such depositions in July.

Attached as Exhibit A is a very rough list of initial proposed PMK deposition categories which will separately be propounded to both Toyota USA and Toyota Japan. Attached as Exhibit B is a list of all subject vehicles pertinent to our discovery plan. As Exhibit C, we have attached an exemplar overview of categories of ETCS related documents our discovery plan will be seeking. Attached as Exhibit D is a list of sales, marketing, advertising and media documents that our discovery plan will also seek; most of which we expect will come from Toyota USA.

As discussed at our meet and confer on June 4, 2010, it is important that we agree on "Load File Specifications" for all documents produced by the Toyota defendants in this litigation. As we told you, it is imperative that the Japanese language documents be delivered in a searchable native format. We propose that the parties meet and confer with our technical support personnel in attendance on or before June 16, 2010 to address the "Load File Specification" issues.

Finally, on our call last Friday, you promised to provide us with your own proposals to the discovery plan as well as your thoughts about Rule 26 Initial Disclosures. In addition, we would request that you respond to Plaintiffs' proposals above as soon as reasonably possible. It may be helpful to have another telephone meet and confer this Friday morning June 11<sup>th</sup>?

Respectfully Submitted,

LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP

By: / s /  
Elizabeth J. Cabraser

ROBINSON, CALCAGNIE & ROBINSON

By: Mark P. Robinson, Jr.  
Mark P. Robinson, Jr.

HAGENS BERMAN SOBOL SHAPIRO LLP

COTCHETT, PITRE & MCCARTHY

By: / s /  
Steve W. Berman

By: / s /  
Frank M. Pitre

SUSMAN GODFREY L.L.P.

By: / s /  
Marc M. Seltzer

EXHIBIT A

PMK Subject Matter Categories For Early Depositions

Document Retention

- The document retention policies and practices at the TOYOTA entities or affiliates since 1998.

Organization

- The TMC organizational structure.
- The TMS organizational structure.
- The organizational structure of all other TOYOTA-related entities.

Communications/Interactions With Toyota Dealers

- All communications between TOYOTA and any dealers of TOYOTA vehicles.

Databases (Goal: Narrow down to ETCS, Floor mat, or Sticky Pedal related databases)

- The names, general purpose(s)/function(s), and location(s) of any computer or electronic databases used, maintained, or stored at any TOYOTA entities or affiliates since 1998.
- The identity of all persons, divisions, entities and/or affiliates that were and/or are responsible for any computer or electronic databases used, maintained, or stored at any TOYOTA entities or affiliates since 1998.
- The name(s) and location(s) of the any computer or electronic databases containing, relating to, or regarding the ETCS for all SUBJECT TOYOTA VEHICLES.
- The identity of all persons, divisions, entities and/or affiliates that were and/or are responsible for any computer or electronic databases containing, relating to, or regarding the ETCS for all SUBJECT TOYOTA VEHICLES.

ETCS

- The nature and location of all DOCUMENTS at TOYOTA related to or regarding the ETCS for all SUBJECT TOYOTA VEHICLES.
- The nature and location of all DOCUMENTS at TOYOTA related to or regarding the design of the ETCS for all SUBJECT TOYOTA VEHICLES.
- The identity of all persons, divisions, entities and/or affiliates that were and/or are responsible for any aspects of the design of the ETCS for all SUBJECT TOYOTA VEHICLES
- The nature and location of all DOCUMENTS at TOYOTA related to or regarding the engineering of the ETCS for all SUBJECT TOYOTA VEHICLES.
- The identity of all persons, divisions, entities and/or affiliates that were and/or are responsible for any aspects of the engineering of the ETCS for all SUBJECT TOYOTA VEHICLES.
- The nature and location of all DOCUMENTS at TOYOTA related to or regarding the testing of the ETCS for all SUBJECT TOYOTA VEHICLES.

- The identity of all persons, divisions, entities and/or affiliates that were and/or are responsible for any aspects of the testing of the ETCS for all SUBJECT TOYOTA VEHICLES.
- The nature and location of all DOCUMENTS at TOYOTA related to or regarding the schematics or drawings of the ETCS for all SUBJECT TOYOTA VEHICLES.
- The identity of all persons, divisions, entities and/or affiliates that were and/or are responsible for creating or retaining the schematics or drawings of the ETCS for all SUBJECT TOYOTA VEHICLES.
- The nature and location of all DOCUMENTS at TOYOTA related to or regarding the component parts used in the ETCS for all SUBJECT TOYOTA VEHICLES.
- The identity of all persons, divisions, entities and/or affiliates that were and/or are responsible for designing, engineering, or testing the component parts used in the ETCS for all SUBJECT TOYOTA VEHICLES.
- The nature and location of all DOCUMENTS at TOYOTA related to or regarding any and all Failure Mode Effects Analyses (or TOYOTA-equivalent) related to or regarding the ETCS for all SUBJECT TOYOTA VEHICLES.
- The identity of all persons, divisions, entities and/or affiliates that were and/or are responsible for conducting any Failure Mode Effects Analyses (or TOYOTA-equivalent) related to or regarding the ETCS for all SUBJECT TOYOTA VEHICLES.
- The nature and location of all DOCUMENTS at TOYOTA related to or regarding the quality control and assurance standards, policies, procedures, and practices applied to, related to or regarding the ETCS for all SUBJECT TOYOTA VEHICLES.
- The identity of all persons, divisions, entities and/or affiliates that were and/or are responsible for creating, applying, or implementing the quality control and assurance standards, policies, procedures, and practices applied to, related to or regarding the ETCS for all SUBJECT TOYOTA VEHICLES.
- The nature and location of all DOCUMENTS at TOYOTA related to or regarding the defect surveillance/early warning standards, policies, procedures, and practices (e.g. Tread Act) related to or regarding the ETCS for all SUBJECT TOYOTA VEHICLES, including but not limited to Mitratech.
- The identity of all persons, divisions, entities and/or affiliates that were and/or are responsible for creating, applying, or implementing the defect surveillance/early warning standards, policies, procedures, and practices (e.g. Tread Act) related to or regarding the ETCS for all SUBJECT TOYOTA VEHICLES, including but not limited to Mitratech.

**EDR (Persons and documents pertaining to the following)**

- EDR Readout Tools used in the United States and other countries.
- SRS Airbag Event Data Recorder Readout Tool Operation Manuals.
- The software design of the EDR Readout Tool.
- Non-software changes made to each and every version of the Readout Tool.
- The changes, corrections, deletions or additions made to each and every version of the Readout Tool Operation Manual.

- A list of the hexadecimal data recorded by the EDR.
- Documents used to manually read and validate the hexadecimal data recorded by the EDR and readout by the EDR Readout Tool.
- The Toyota departments that designed and manufactured the EDR Readout Tools.
- The Toyota employees involved in the design and manufacture of the EDR Readout Tools.
- A list (including make, model and year) of the relevant vehicles sold in the United States that have an EDR installed and the data each EDR records.
- A list (including make, model and year) in the relevant vehicles sold outside the US that has an EDR installed and the data each EDR records.
- The Passwords used for the security release on the EDR tool.
- The Accelerator Full Open Voltage Values used for input into the EDR Readout Tool.
- The testing done to validate the operation and accuracy of the EDR Readout Tool.
- The testing done to validate the operation and accuracy of the EDR Readout Tool.
- Details of all EDR downloads Toyota representatives have performed in the United States.

**Subject Vehicles generally**

- The nature and location of all DOCUMENTS at TOYOTA related to or regarding the design of the SUBJECT TOYOTA VEHICLES.
- The nature and location of all DOCUMENTS at TOYOTA related to or regarding the engineering of the SUBJECT TOYOTA VEHICLES.
- The nature and location of all DOCUMENTS at TOYOTA related to or regarding the testing of the SUBJECT TOYOTA VEHICLES.
- The nature and location of all DOCUMENTS at TOYOTA related to or regarding the schematics of the SUBJECT TOYOTA VEHICLES.
- The nature and location of all DOCUMENTS at TOYOTA related to or regarding the drawings of the SUBJECT TOYOTA VEHICLES.
- The nature and location of all DOCUMENTS at TOYOTA related to or regarding the component parts used in the SUBJECT TOYOTA VEHICLES.
- The nature and location of all DOCUMENTS at TOYOTA related to or regarding any and all Failure Mode Effects Analyses (or TOYOTA-equivalent) related to or regarding the SUBJECT TOYOTA VEHICLES.
- The identity of all persons, divisions, entities and/or affiliates that were and/or are responsible for conducting any Failure Mode Effects Analyses (or TOYOTA-equivalent) related to or regarding the SUBJECT TOYOTA VEHICLES.
- The nature and location of all DOCUMENTS at TOYOTA related to or regarding the quality control and assurance standards, policies, procedures, and practices applied to, related to or regarding the SUBJECT TOYOTA VEHICLES.
- The identity of all persons, divisions, entities and/or affiliates that were and/or are responsible for creating, applying, or implementing the quality control and assurance standards, policies, procedures, and practices applied to, related to or regarding the SUBJECT TOYOTA VEHICLES.

- The nature and location of all DOCUMENTS at TOYOTA related to or regarding the defect surveillance/early warning standards, policies, procedures, and practices (e.g. Tread Act) related to or regarding the SUBJECT TOYOTA VEHICLES.
- The identity of all persons, divisions, entities and/or affiliates that were and/or are responsible for creating, applying, or implementing the defect surveillance/early warning standards, policies, procedures, and practices (e.g. Tread Act) related to or regarding the SUBJECT TOYOTA VEHICLES.

#### UA Events

- The nature and location of all DOCUMENTS at TOYOTA related to or regarding any alleged or potential UA EVENTS.
- The identity of all persons, divisions, entities and/or affiliates (including the Consumer Assistance Center and/or CAC) that was and/or is responsible for considering, testing, or analyzing in any way the issues related to or regarding any alleged or potential UA EVENTS.

#### Vendors

- The identity and purpose/function of all vendors used by TOYOTA in the design, engineering, and testing of the ETCS in the SUBJECT TOYOTA VEHICLES, including but not limited to Denso and CTS.
- The nature and location of all DOCUMENTS at TOYOTA regarding or relating to all vendors used by TOYOTA in the design, engineering, and testing of the ETCS in the SUBJECT TOYOTA VEHICLES, including but not limited to Denso and CTS.
- The nature and location of all DOCUMENTS in the possession of the relevant vendors that were used by TOYOTA in the design, engineering, and testing of the ETCS in the SUBJECT TOYOTA VEHICLES, including but not limited to Denso and CTS.
- All communications between TOYOTA and Denso.
- All communications between TOYOTA and Mitratach/TeamConnect.

#### Warranty Claims

- The nature and location of all DOCUMENTS at TOYOTA related to or regarding any warranty claims regarding any potential issues with UA, pedals, floor mats, "surging," "driveability" and/or any potential problems with the ETCS in any SUBJECT TOYOTA VEHICLES.
- The identity of all persons, divisions, entities and/or affiliates that were and/or are responsible for creating, applying, or implementing any standards, policies, procedures, and practices regarding any warranty claims regarding UA, pedals, floor mats, "surging," "driveability," and/or any potential problems with the ETCS in any SUBJECT TOYOTA VEHICLES.

#### TSBs/Changes/Revisions/Modifications/Recalibrations

- The nature and location of all DOCUMENTS at TOYOTA related to or regarding any Technical Service Bulletins issued by TOYOTA regarding the SUBJECT TOYOTA VEHICLES.

- The identity of all persons, divisions, entities and/or affiliates that were and/or are responsible for creating, applying, or implementing any standards, policies, procedures, and practices regarding any Technical Service Bulletins issued by TOYOTA regarding the SUBJECT TOYOTA VEHICLES.
- The nature and location of all DOCUMENTS at TOYOTA related to or regarding any changes, revisions, modifications, or recalibrations in the ETCS of the SUBJECT TOYOTA VEHICLES since 1998.
- The identity of all persons, divisions, entities and/or affiliates that were and/or are responsible for any changes, revisions, modifications, or recalibrations in the ETCS of the SUBJECT TOYOTA VEHICLES since 1998.
- The nature and location of all DOCUMENTS at TOYOTA related to or regarding any changes, revisions, modifications, or recalibrations in or of the SUBJECT TOYOTA VEHICLES since 1998.
- The identity of all persons, divisions, entities and/or affiliates that were and/or are responsible for any changes, revisions, modifications, or recalibrations in or the SUBJECT VEHICLES since 1998.

EXHIBIT B

## Toyota Vehicles with ETCS-i

Year	Make	Model	Engine	ETCS-i	Vehicle Model/Engine Code
2009	Toyota	Highlander	1AR-FE	Yes	<u>2009 Highlander Model Code</u>
2009	Toyota	Venza	1AR-FE	Yes	<u>2009 Venza Model Code</u>
2010	Toyota	Highlander	1AR-FE	Yes	<u>2010 Highlander Model Code</u>
2010	Toyota	Venza	1AR-FE	Yes	<u>2010 Venza Model Code</u>
2001	Toyota	RAV4	1AZ-FE	No	<u>2001 RAV4 Model Code</u>
2002	Toyota	RAV4	1AZ-FE	No	<u>2002 RAV4 Model Code</u>
2003	Toyota	RAV4	1AZ-FE	No	<u>2003 RAV4 Model Code</u>
2003	Toyota	4Runner	1GR-FE	Yes	<u>2003 4Runner Model Code</u>
2004	Toyota	4Runner	1GR-FE	Yes	<u>2004 4Runner Model Code</u>
2005	Toyota	4Runner	1GR-FE	Yes	<u>2005 4Runner Model Code</u>
2005	Toyota	Tacoma	1GR-FE	Yes	<u>2005 Tacoma Model Code</u>
2005	Toyota	Tundra	1GR-FE	Yes	<u>2005 Tundra Model Code</u>
2006	Toyota	4Runner	1GR-FE	Yes	<u>2006 4Runner Model Code</u>
2006	Toyota	Tacoma	1GR-FE	Yes	<u>2006 Tacoma Model Code</u>
2006	Toyota	Tundra	1GR-FE	Yes	<u>2006 Tundra Model Code</u>
2007	Toyota	4Runner	1GR-FE	Yes	<u>2007 4Runner Model Code</u>
2007	Toyota	FJ Cruiser	1GR-FE	Yes	<u>2007 FJ Cruiser Model Code</u>
2007	Toyota	Tacoma	1GR-FE	Yes	<u>2007 Tacoma Model Code</u>
2007	Toyota	Tundra	1GR-FE	Yes	<u>2007 Tundra Model Code</u>
2008	Toyota	4Runner	1GR-FE	Yes	<u>2008 4Runner Model Code</u>
2008	Toyota	FJ Cruiser	1GR-FE	Yes	<u>2008 FJ Cruiser Model Code</u>
2008	Toyota	Tacoma	1GR-FE	Yes	<u>2008 Tacoma Model Code</u>
2008	Toyota	Tundra	1GR-FE	Yes	<u>2008 Tundra Model Code</u>
2009	Toyota	4Runner	1GR-FE	Yes	<u>2009 4Runner Model Code</u>
2009	Toyota	FJ Cruiser	1GR-FE	Yes	<u>2009 FJ Cruiser Model Code</u>
2009	Toyota	Tacoma	1GR-FE	Yes	<u>2009 Tacoma Model Code</u>
2009	Toyota	Tundra	1GR-FE	Yes	<u>2009 Tundra Model Code</u>
2010	Toyota	4Runner	1GR-FE	Yes	<u>2010 4Runner Model Code</u>
2010	Toyota	FJ Cruiser	1GR-FE	Yes	<u>2010 FJ Cruiser Model Code</u>
2010	Toyota	Tacoma	1GR-FE	Yes	<u>2010 Tacoma Model Code</u>
2010	Toyota	Tundra	1GR-FE	Yes	<u>2010 Tundra Model Code</u>
1998	Toyota	Sienna	1MZ-FE	No	<u>1998 Sienna Model Code</u>
1999	Lexus	ES300	1MZ-FE	No	<u>1999 ES300 Model Code</u>
1999	Lexus	RX300	1MZ-FE	No	<u>1999 RX300 Model Code</u>
1999	Toyota	Camry	1MZ-FE	No	<u>1999 Camry Model Code</u>
1999	Toyota	Sienna	1MZ-FE	No	<u>1999 Sienna Model Code</u>
2000	Lexus	ES300	1MZ-FE	No	<u>2000 ES300 Model Code</u>
2000	Lexus	RX300	1MZ-FE	No	<u>2000 RX300 Model Code</u>
2000	Toyota	Avalon	1MZ-FE	No	<u>2000 Avalon Model Code</u>
2000	Toyota	Camry	1MZ-FE	No	<u>2000 Camry Model Code</u>
2000	Toyota	Sienna	1MZ-FE	No	<u>2000 Sienna Model Code</u>
2001	Lexus	ES300	1MZ-FE	No	<u>2001 ES300 Model Code</u>
2001	Lexus	RX300	1MZ-FE	No	<u>2001 RX300 Model Code</u>
2001	Toyota	Avalon	1MZ-FE	No	<u>2001 Avalon Model Code</u>
2001	Toyota	Camry	1MZ-FE	No	<u>2001 Camry Model Code</u>
2001	Toyota	Highlander	1MZ-FE	No	<u>2001 Highlander Model Code</u>
2001	Toyota	Sienna	1MZ-FE	No	<u>2001 Sienna Model Code</u>

EXHIBIT B

## Toyota Vehicles with ETCS-i

2001	Toyota	Solara	1MZ-FE	No	<u>2001 Solara Model Code</u>
2002	Lexus	ES300	1MZ-FE	Yes	<u>2002 ES300 Model Code</u>
2002	Lexus	RX300	1MZ-FE	No	<u>2002 RX300 Model Code</u>
2002	Toyota	Avalon	1MZ-FE	No	<u>2002 Avalon Model Code</u>
2002	Toyota	Camry	1MZ-FE	Yes	<u>2002 Camry Model Code</u>
2002	Toyota	High	1MZ-FE	No	<u>2002 Highlander Model Code</u>
2002	Toyota	Sienna	1MZ-FE	No	<u>2002 Sienna Model Code</u>
2002	Toyota	Solara	1MZ-FE	No	<u>2002 Solara Model Code</u>
2003	Lexus	ES300	1MZ-FE	Yes	<u>2003 ES300 Model Code</u>
2003	Lexus	RX300	1MZ-FE	No	<u>2003 RX300 Model Code</u>
2003	Toyota	Avalon	1MZ-FE	No	<u>2003 Avalon Model Code</u>
2003	Toyota	Camry	1MZ-FE	Yes	<u>2003 Camry Model Code</u>
2003	Toyota	Highlander	1MZ-FE	No	<u>2003 Highlander Model Code</u>
2003	Toyota	Sienna	1MZ-FE	No	<u>2003 Sienna Model Code</u>
2003	Toyota	Solara	1MZ-FE	No	<u>2003 Solara Model Code</u>
2004	Toyota	Avalon	1MZ-FE	No	<u>2004 Avalon Model Code</u>
2004	Toyota	Camry	1MZ-FE	Yes	<u>2004 Camry Model Code</u>
2005	Toyota	Camry	1MZ-FE	Yes	<u>2005 Camry Model Code</u>
2006	Toyota	Camry	1MZ-FE	Yes	<u>2006 Camry Model Code</u>
2000	Toyota	Echo	1NZ-FE	No	<u>2000 Echo Model Code</u>
2001	Toyota	Echo	1NZ-FE	No	<u>2001 Echo Model Code</u>
2002	Toyota	Echo	1NZ-FE	No	<u>2002 Echo Model Code</u>
2003	Toyota	Echo	1NZ-FE	No	<u>2003 Echo Model Code</u>
2004	Scion	xA	1NZ-FE	No	<u>2004 xA Model Code</u>
2004	Scion	xB	1NZ-FE	No	<u>2004 xB Model Code</u>
2004	Toyota	Echo	1NZ-FE	No	<u>2004 Echo Model Code</u>
2005	Scion	xA	1NZ-FE	No	<u>2005 xA Model Code</u>
2005	Scion	xB	1NZ-FE	No	<u>2005 xB Model Code</u>
2005	Toyota	Echo	1NZ-FE	No	<u>2005 Echo Model Code</u>
2006	Scion	xA	1NZ-FE	No	<u>2006 xA Model Code</u>
2006	Scion	xB	1NZ-FE	No	<u>2006 xB Model Code</u>
2006	Toyota	Yaris	1NZ-FE	Yes	<u>2006 Yaris Model Code</u>
2007	Toyota	Yaris	1NZ-FE	Yes	<u>2007 Yaris Model Code</u>
2008	Toyota	Yaris	1NZ-FE	Yes	<u>2008 Yaris Model Code</u>
2009	Toyota	Yaris	1NZ-FE	Yes	<u>2009 Yaris Model Code</u>
2010	Toyota	Yaris	1NZ-FE	Yes	<u>2010 Yaris Model Code</u>
2001	Toyota	Prius	1NZ-FXE	Yes	<u>2001 Prius Model Code</u>
2002	Toyota	Prius	1NZ-FXE	Yes	<u>2002 Prius Model Code</u>
2003	Toyota	Prius	1NZ-FXE	Yes	<u>2003 Prius Model Code</u>
2004	Toyota	Prius	1NZ-FXE	Yes	<u>2004 Prius Model Code</u>
2005	Toyota	Prius	1NZ-FXE	Yes	<u>2005 Prius Model Code</u>
2006	Toyota	Prius	1NZ-FXE	Yes	<u>2006 Prius Model Code</u>
2007	Toyota	Prius	1NZ-FXE	Yes	<u>2007 Prius Model Code</u>
2008	Toyota	Prius	1NZ-FXE	Yes	<u>2008 Prius Model Code</u>
2009	Toyota	Prius	1NZ-FXE	Yes	<u>2009 Prius Model Code</u>
2004	Toyota	Yaris	1SZ-FE	Yes	<u>2004 Yaris Model Code</u>
2005	Toyota	Yaris	1SZ-FE	Yes	<u>2005 Yaris Model Code</u>
2010	Toyota	Sequoia	1UR-FE	Yes	<u>2010 Sequoia Model Code</u>
2010	Toyota	Tundra	1UR-FE	Yes	<u>2010 Tundra Model Code</u>
2007	Lexus	LS460	1UR-FSE	Yes	<u>2007 LS460 Model Code</u>

EXHIBIT B

## Toyota Vehicles with ETCS-i

2008	Lexus	GS460	1UR-FSE	Yes	2008 GS460 Model Code
2008	Lexus	LS460	1UR-FSE	Yes	2008 LS460 Model Code
2009	Lexus	GS460	1UR-FSE	Yes	2009 GS460 Model Code
2009	Lexus	LS460	1UR-FSE	Yes	2009 LS460 Model Code
2010	Lexus	GS460	1UR-FSE	Yes	2010 GS460 Model Code
2010	Lexus	LS460	1UR-FSE	Yes	2010 LS460 Model Code
1998	Lexus	GS400	1UZ-FE	Yes	1998 GS400 Model Code
1998	Lexus	IS400	1UZ-FE	Yes	1998 LS400 Model Code
1998	Lexus	SC400	1UZ-FE	Yes	1998 SC400 Model Code
1999	Lexus	GS400	1UZ-FE	Yes	1999 GS400 Model Code
1999	Lexus	IS400	1UZ-FE	Yes	1999 LS400 Model Code
1999	Lexus	SC400	1UZ-FE	Yes	1999 SC400 Model Code
2000	Lexus	GS400	1UZ-FE	Yes	2000 GS400 Model Code
2000	Lexus	IS400	1UZ-FE	Yes	2000 LS400 Model Code
2000	Lexus	SC400	1UZ-FE	Yes	2000 SC400 Model Code
2000	Toyota	Celica	1ZZ-FE	No	2000 Celica Model Code
2000	Toyota	Corolla	1ZZ-FE	No	2000 Corolla Model Code
					2000 MR2 Spyder Model
2000	Toyota	MR2 Spyder	1ZZ-FE	No	Code
2001	Toyota	Celica	1ZZ-FE	No	2001 Celica Model Code
2001	Toyota	Corolla	1ZZ-FE	No	2001 Corolla Model Code
					2001 MR2 Spyder Model
2001	Toyota	MR2 Spyder	1ZZ-FE	Yes	Code
2002	Toyota	Celica	1ZZ-FE	No	2002 Celica Model Code
2002	Toyota	Corolla	1ZZ-FE	No	2002 Corolla Model Code
					2002 MR2 Spyder Model
2002	Toyota	MR2 Spyder	1ZZ-FE	Yes	Code
2003	Toyota	Celica	1ZZ-FE	No	2003 Celica Model Code
2003	Toyota	Corolla	1ZZ-FE	No	2003 Corolla Model Code
2003	Toyota	Matrix	1ZZ-FE	No	2003 Matrix Model Code
					2003 MR2 Spyder Model
2003	Toyota	MR2 Spyder	1ZZ-FE	Yes	Code
2004	Toyota	Celica	1ZZ-FE	No	2004 Celica Model Code
2004	Toyota	Corolla	1ZZ-FE	No	2004 Corolla Model Code
2004	Toyota	Matrix	1ZZ-FE	No	2004 Matrix Model Code
					2004 MR2 Spyder Model
2004	Toyota	MR2 Spyder	1ZZ-FE	Yes	Code
2005	Toyota	Celica	1ZZ-FE	No	2005 Celica Model Code
2005	Toyota	Corolla	1ZZ-FE	Yes	2005 Corolla Model Code
2005	Toyota	Matrix	1ZZ-FE	Yes	2005 Matrix Model Code
					2005 MR2 Spyder Model
2005	Toyota	MR2 Spyder	1ZZ-FE	Yes	Code
2006	Toyota	Corolla	1ZZ-FE	Yes	2006 Corolla Model Code
2006	Toyota	Corolla	1ZZ-FE	Yes	2006 Corolla Model Code
2006	Toyota	Matrix	1ZZ-FE	Yes	2006 Matrix Model Code
2007	Toyota	Corolla	1ZZ-FE	Yes	2007 Corolla Model Code
2007	Toyota	Matrix	1ZZ-FE	Yes	2007 Matrix Model Code
2008	Toyota	Corolla	1ZZ-FE	Yes	2008 Corolla Model Code
2008	Toyota	Matrix	1ZZ-FE	Yes	2008 Matrix Model Code
2006	Toyota	Matrix	1ZZ-FE (4WD)	No	2006 Matrix Model Code
2006	Toyota	Matrix	1ZZ-FE (4WD)	No	2006 Matrix Model Code
2006	Toyota	Matrix	1ZZ-FE (4WD)	No	2006 Matrix Model Code

EXHIBIT B

## Toyota Vehicles with ETCS-i

2009	Toyota	RAV4	2AR-FE	Yes	2009 RAV4 Model Code
2010	Toyota	Camry	2AR-FE	Yes	2010 Camry Model Code
2010	Toyota	RAV4	2AR-FE	Yes	2010 RAV4 Model Code
2001	Toyota	Highlander	2AZ-FE	No	2001 Highlander Model Code
2002	Toyota	Camry	2AZ-FE	Yes	2002 Camry Model Code
2002	Toyota	Highlander	2AZ-FE	No	2002 Highlander Model Code
2002	Toyota	Solara	2AZ-FE	Yes	2002 Solara Model Code
2003	Toyota	Camry	2AZ-FE	Yes	2003 Camry Model Code
2003	Toyota	Highlander	2AZ-FE	No	2003 Highlander Model Code
2003	Toyota	Solara	2AZ-FE	Yes	2003 Solara Model Code
2004	Toyota	Camry	2AZ-FE	Yes	2004 Camry Model Code
2004	Toyota	Highlander	2AZ-FE	Yes	2004 Highlander Model Code
2004	Toyota	RAV4	2AZ-FE	Yes	2004 RAV4 Model Code
2005	Scion	tC	2AZ-FE	Yes	2005 tC Model Code
2005	Toyota	Camry	2AZ-FE	Yes	2005 Camry Model Code
2005	Toyota	Highlander	2AZ-FE	Yes	2005 Highlander Model Code
2005	Toyota	RAV4	2AZ-FE	Yes	2005 RAV4 Model Code
2005	Toyota	Solara	2AZ-FE	Yes	2005 Solara Model Code
2006	Scion	tC	2AZ-FE	Yes	2006 tC Model Code
2006	Toyota	Camry	2AZ-FE	Yes	2006 Camry Model Code
2006	Toyota	Highlander	2AZ-FE	Yes	2006 Highlander Model Code
2006	Toyota	RAV4	2AZ-FE	Yes	2006 RAV4 Model Code
2006	Toyota	Solara	2AZ-FE	Yes	2006 Solara Model Code
2007	Scion	tC	2AZ-FE	Yes	2007 tC Model Code
2007	Toyota	Camry	2AZ-FE	Yes	2007 Camry Model Code
2007	Toyota	Highlander	2AZ-FE	Yes	2007 Highlander Model Code
2007	Toyota	RAV4	2AZ-FE	Yes	2007 RAV4 Model Code
2007	Toyota	Solara	2AZ-FE	Yes	2007 Solara Model Code
2008	Scion	tC	2AZ-FE	Yes	2008 tC Model Code
2008	Scion	tC	2AZ-FE	Yes	2009 tC Model Code
2008	Scion	xB	2AZ-FE	Yes	2008 xB Model Code
2008	Toyota	Camry	2AZ-FE	Yes	2008 Camry Model Code
2008	Toyota	RAV4	2AZ-FE	Yes	2008 RAV4 Model Code
2008	Toyota	Solara	2AZ-FE	Yes	2008 Solara Model Code
2009	Scion	xB	2AZ-FE	Yes	2009 xB Model Code
2009	Toyota	Camry	2AZ-FE	Yes	2008 Camry Model Code
2009	Toyota	Corolla	2AZ-FE	Yes	2009 Corolla Model Code
2009	Toyota	Matrix	2AZ-FE	Yes	2009 Matrix Model Code
2010	Scion	tC	2AZ-FE	Yes	2010 tC Model Code
2010	Scion	xB	2AZ-FE	Yes	2010 xB Model Code
2010	Toyota	Corolla	2AZ-FE	Yes	2010 Corolla Model Code
2010	Toyota	Matrix	2AZ-FE	Yes	2010 Matrix Model Code
2007	Toyota	Camry HV	2AZ-FXE	Yes	2007 Camry HV Model Code
2008	Toyota	Camry HV	2AZ-FXE	Yes	2008 Camry HV Model Code

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## Toyota Vehicles with ETCS-i

2009	Toyota	Camry HV	2AZ-FXE	Yes	<u>2009 Camry HV Model Code</u>
2010	Lexus	HS250h	2AZ-FXE	Yes	<u>2010 HS250h Model Code</u>
2010	Toyota	Camry HV	2AZ-FXE	Yes	<u>2010 Camry HV Model Code</u>
2005	Toyota	Avalon	2GR-FE	Yes	<u>2005 Avalon Model Code</u>
2006	Toyota	Avalon	2GR-FE	Yes	<u>2006 Avalon Model Code</u>
2006	Toyota	RAV4	2GR-FE	Yes	<u>2006 RAV4 Model Code</u>
2007	Lexus	ES350	2GR-FE	Yes	<u>2007 ES350 Model Code</u>
2007	Lexus	RX350	2GR-FE	Yes	<u>2007 RX350 Model Code</u>
2007	Toyota	Avalon	2GR-FE	Yes	<u>2007 Avalon Model Code</u>
2007	Toyota	Camry	2GR-FE	Yes	<u>2007 Camry Model Code</u>
2007	Toyota	RAV4	2GR-FE	Yes	<u>2007 RAV4 Model Code</u>
2007	Toyota	Sienna	2GR-FE	Yes	<u>2007 Sienna Model Code</u>
2008	Lexus	ES350	2GR-FE	Yes	<u>2008 ES350 Model Code</u>
2008	Lexus	RX350	2GR-FE	Yes	<u>2008 RX350 Model Code</u>
2008	Toyota	Avalon	2GR-FE	Yes	<u>2008 Avalon Model Code</u>
2008	Toyota	Camry	2GR-FE	Yes	<u>2008 Camry Model Code</u>
2008	Toyota	Highlander	2GR-FE	Yes	<u>2008 Highlander Model Code</u>
2008	Toyota	RAV4	2GR-FE	Yes	<u>2008 RAV4 Model Code</u>
2008	Toyota	Sienna	2GR-FE	Yes	<u>2008 Sienna Model Code</u>
2009	Lexus	ES350	2GR-FE	Yes	<u>2009 ES350 Model Code</u>
2009	Lexus	RX350	2GR-FE	Yes	<u>2009 RX350 Model Code</u>
2009	Toyota	Avalon	2GR-FE	Yes	<u>2009 Avalon Model Code</u>
2009	Toyota	Camry	2GR-FE	Yes	<u>2009 Camry Model Code</u>
2009	Toyota	Highlander	2GR-FE	Yes	<u>2009 Highlander Model Code</u>
2009	Toyota	RAV4	2GR-FE	Yes	<u>2009 RAV4 Model Code</u>
2009	Toyota	Sienna	2GR-FE	Yes	<u>2009 Sienna Model Code</u>
2009	Toyota	Venza	2GR-FE	Yes	<u>2009 Venza Model Code</u>
2010	Lexus	ES350	2GR-FE	Yes	<u>2010 ES350 Model Code</u>
2010	Lexus	RX350	2GR-FE	Yes	<u>2010 RX350 Model Code</u>
2010	Toyota	Avalon	2GR-FE	Yes	<u>2010 Avalon Model Code</u>
2010	Toyota	Camry	2GR-FE	Yes	<u>2010 Camry Model Code</u>
2010	Toyota	Highlander	2GR-FE	Yes	<u>2010 Highlander Model Code</u>
2010	Toyota	RAV4	2GR-FE	Yes	<u>2010 RAV4 Model Code</u>
2010	Toyota	Sienna	2GR-FE	Yes	<u>2010 Sienna Model Code</u>
2010	Toyota	Venza	2GR-FE	Yes	<u>2010 Venza Model Code</u>
2006	Lexus	IS350	2GR-FSE	Yes	<u>2006 IS350 Model Code</u>
2007	Lexus	GS350	2GR-FSE	Yes	<u>2007 GS350 Model Code</u>
2007	Lexus	GS450h	2GR-FSE	Yes	<u>2007 GS450h Model Code</u>
2007	Lexus	IS350	2GR-FSE	Yes	<u>2007 IS350 Model Code</u>
2008	Lexus	GS350	2GR-FSE	Yes	<u>2008 GS350 Model Code</u>
2008	Lexus	GS450h	2GR-FSE	Yes	<u>2008 GS450h Model Code</u>
2008	Lexus	IS350	2GR-FSE	Yes	<u>2008 IS350 Model Code</u>
2009	Lexus	GS350	2GR-FSE	Yes	<u>2009 GS350 Model Code</u>
2009	Lexus	GS450h	2GR-FSE	Yes	<u>2009 GS450h Model Code</u>
2009	Lexus	IS350	2GR-FSE	Yes	<u>2009 IS350 Model Code</u>
2010	Lexus	GS350	2GR-FSE	Yes	<u>2010 GS350 Model Code</u>
2010	Lexus	GS450h	2GR-FSE	Yes	<u>2010 GS450h Model Code</u>

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## Toyota Vehicles with ETCS-I

2010	Lexus	IS350	2GR-FSE	Yes	2010 IS350 Model Code
2010	Lexus	IS350C	2GR-FSE	Yes	2010 IS350C Model Code
2010	Lexus	RX450h	2GR-FXE	Yes	2010 RX450h Model Code
1998	Lexus	GS300	2JZ-GE	Yes	1998 GS300 Model Code
1998	Lexus	SC300	2JZ-GE	Yes	1998 SC300 Model Code
1998	Lexus	SC400	2JZ-GE	Yes	1998 SC400 Model Code
1998	Toyota	Supra	2JZ-GE	Yes	1998 Supra Model Code
1999	Lexus	GS300	2JZ-GE	Yes	1999 GS300 Model Code
1999	Lexus	SC300	2JZ-GE	Yes	1999 SC300 Model Code
2000	Lexus	GS300	2JZ-GE	Yes	2000 GS300 Model Code
2000	Lexus	SC300	2JZ-GE	Yes	2000 SC300 Model Code
2001	Lexus	GS300	2JZ-GE	Yes	2001 GS300 Model Code
2001	Lexus	IS300	2JZ-GE	Yes	2001 IS300 Model Code
2002	Lexus	GS300	2JZ-GE	Yes	2002 GS300 Model Code
2002	Lexus	IS300	2JZ-GE	Yes	2002 IS300 Model Code
2003	Lexus	GS300	2JZ-GE	Yes	2003 GS300 Model Code
2003	Lexus	IS300	2JZ-GE	Yes	2003 IS300 Model Code
2004	Lexus	GS300	2JZ-GE	Yes	2004 GS300 Model Code
2004	Lexus	IS300	2JZ-GE	Yes	2004 IS300 Model Code
2005	Lexus	GS300	2JZ-GE	Yes	2005 GS300 Model Code
2005	Lexus	IS300	2JZ-GE	Yes	2005 IS300 Model Code
1998	Toyota	Supra	2JZ-GTE	No	1998 Supra Model Code
1999	Toyota	Tacoma	2RZ-FE	No	1999 Tacoma Model Code
2000	Toyota	Tacoma	2RZ-FE	No	2000 Tacoma Model Code
2001	Toyota	Tacoma	2RZ-FE	No	2001 Tacoma Model Code
2002	Toyota	Tacoma	2RZ-FE	No	2002 Tacoma Model Code
2003	Toyota	Tacoma	2RZ-FE	No	2003 Tacoma Model Code
2004	Toyota	Tacoma	2RZ-FE	No	2004 Tacoma Model Code
2005	Toyota	Tacoma	2TR-FE	Yes	2005 Tacoma Model Code
2006	Toyota	Tacoma	2TR-FE	Yes	2006 Tacoma Model Code
2007	Toyota	Tacoma	2TR-FE	Yes	2007 Tacoma Model Code
2008	Toyota	Tacoma	2TR-FE	Yes	2008 Tacoma Model Code
2009	Toyota	Tacoma	2TR-FE	Yes	2009 Tacoma Model Code
2010	Toyota	4Runner	2TR-FE	Yes	2010 4Runner Model Code
2010	Toyota	Tacoma	2TR-FE	Yes	2010 Tacoma Model Code
2008	Lexus	LS600h	2UR-FSE	Yes	2008 LS600h Model Code
2009	Lexus	LS600h	2UR-FSE	Yes	2009 LS600h Model Code
2008	Lexus	IS F	2UR-GSE	Yes	2008 IS F Model Code
2009	Lexus	IS F	2UR-GSE	Yes	2009 IS F Model Code
2010	Lexus	IS F	2UR-GSE	Yes	2010 IS F Model Code
1998	Lexus	LX470	2UZ-FE	Yes	1998 LX470 Model Code
					1998 Land Cruiser Model
1998	Toyota	Land Cruiser	2UZ-FE	Yes	Code
1999	Lexus	LX470	2UZ-FE	Yes	1999 LX470 Model Code
					1999 Land Cruiser Model
1999	Toyota	Land Cruiser	2UZ-FE	Yes	Code
2000	Lexus	LX470	2UZ-FE	Yes	2000 LX470 Model Code
					2000 Land Cruiser Model
2000	Toyota	Land Cruiser	2UZ-FE	Yes	Code
2000	Toyota	Tundra	2UZ-FE	Yes	2000 Tundra Model Code
2001	Lexus	LX470	2UZ-FE	Yes	2001 LX470 Model Code
2001	Lexus	LX470	2UZ-FE	Yes	2002 LX470 Model Code

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## Toyota Vehicles with ETCS-i

2001	Toyota	Land Cruiser	2UZ-FE	Yes	<u>2001 Land Cruiser Model</u> <u>Code</u>
2001	Toyota	Sequoia	2UZ-FE	Yes	<u>2001 Sequoia Model Code</u>
2001	Toyota	Tundra	2UZ-FE	Yes	<u>2001 Tundra Model Code</u>
2002	Lexus	LX470	2UZ-FE	Yes	<u>2003 LX470 Model Code</u>
					<u>2002 Land Cruiser Model</u> <u>Code</u>
2002	Toyota	Land Cruiser	2UZ-FE	Yes	<u>2002 Sequoia Model Code</u>
2002	Toyota	Sequoia	2UZ-FE	Yes	<u>2002 Tundra Model Code</u>
2003	Lexus	GX470	2UZ-FE	Yes	<u>2003 GX470 Model Code</u>
2003	Lexus	LX470	2UZ-FE	Yes	<u>2004 LX470 Model Code</u>
2003	Toyota	4Runner	2UZ-FE	Yes	<u>2003 4Runner Model Code</u>
					<u>2003 Land Cruiser Model</u> <u>Code</u>
2003	Toyota	Land Cruiser	2UZ-FE	Yes	<u>2003 Sequoia Model Code</u>
2003	Toyota	Tundra	2UZ-FE	Yes	<u>2003 Tundra Model Code</u>
2004	Lexus	GX470	2UZ-FE	Yes	<u>2004 GX470 Model Code</u>
2004	Lexus	LX470	2UZ-FE	Yes	<u>2005 LX470 Model Code</u>
2004	Toyota	4Runner	2UZ-FE	Yes	<u>2004 4Runner Model Code</u>
					<u>2004 Land Cruiser Model</u> <u>Code</u>
2004	Toyota	Land Cruiser	2UZ-FE	Yes	<u>2004 Sequoia Model Code</u>
2004	Toyota	Tundra	2UZ-FE	Yes	<u>2004 Tundra Model Code</u>
2005	Lexus	GX470	2UZ-FE	Yes	<u>2005 GX470 Model Code</u>
2005	Toyota	4Runner	2UZ-FE	Yes	<u>2005 4Runner Model Code</u>
					<u>2005 Land Cruiser Model</u> <u>Code</u>
2005	Toyota	Land Cruiser	2UZ-FE	Yes	<u>2005 Sequoia Model Code</u>
2005	Toyota	Tundra	2UZ-FE	Yes	<u>2005 Tundra Model Code</u>
2006	Lexus	GX470	2UZ-FE	Yes	<u>2006 GX470 Model Code</u>
2006	Lexus	LX470	2UZ-FE	Yes	<u>2006 LX470 Model Code</u>
2006	Toyota	4Runner	2UZ-FE	Yes	<u>2006 4Runner Model Code</u>
					<u>2006 Land Cruiser Model</u> <u>Code</u>
2006	Toyota	Land Cruiser	2UZ-FE	Yes	<u>2006 Sequoia Model Code</u>
2006	Toyota	Tundra	2UZ-FE	Yes	<u>2006 Tundra Model Code</u>
2007	Lexus	GX470	2UZ-FE	Yes	<u>2007 GX470 Model Code</u>
2007	Lexus	LX470	2UZ-FE	Yes	<u>2007 LX470 Model Code</u>
2007	Toyota	4Runner	2UZ-FE	Yes	<u>2007 4Runner Model Code</u>
					<u>2007 Land Cruiser Model</u> <u>Code</u>
2007	Toyota	Land Cruiser	2UZ-FE	Yes	<u>2007 Sequoia Model Code</u>
2007	Toyota	Tundra	2UZ-FE	Yes	<u>2007 Tundra Model Code</u>
2008	Lexus	GX470	2UZ-FE	Yes	<u>2008 GX470 Model Code</u>
2008	Toyota	4Runner	2UZ-FE	Yes	<u>2008 4Runner Model Code</u>
2008	Toyota	Sequoia	2UZ-FE	Yes	<u>2008 Sequoia Model Code</u>
2008	Toyota	Tundra	2UZ-FE	Yes	<u>2008 Tundra Model Code</u>
2009	Lexus	GX470	2UZ-FE	Yes	<u>2009 GX470 Model Code</u>
2009	Toyota	4Runner	2UZ-FE	Yes	<u>2009 4Runner Model Code</u>
2009	Toyota	Sequoia	2UZ-FE	Yes	<u>2009 Sequoia Model Code</u>
2009	Toyota	Tundra	2UZ-FE	Yes	<u>2009 Tundra Model Code</u>
2008	Scion	xD	2ZR-FE	Yes	<u>2008 xD Model Code</u>

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## Toyota Vehicles with ETCS-i

2009	Scion	xD	2ZR-FE	Yes	2009 xD Model Code
2009	Toyota	Corolla	2ZR-FE	Yes	<u>2009 Corolla Model Code</u>
2009	Toyota	Matrix	2ZR-FE	Yes	<u>2009 Matrix Model Code</u>
2010	Scion	xD	2ZR-FE	Yes	<u>2010 xD Model Code</u>
2010	Toyota	Corolla	2ZR-FE	Yes	<u>2010 Corolla Model Code</u>
2010	Toyota	Matrix	2ZR-FE	Yes	<u>2010 Matrix Model Code</u>
2010	Toyota	Prius	2ZR-FXE	Yes	<u>2010 Prius Model Code</u>
2000	Toyota	Celica	2ZZ-GE	No	<u>2000 Celica Model Code</u>
2001	Toyota	Celica	2ZZ-GE	No	<u>2001 Celica Model Code</u>
2002	Toyota	Celica	2ZZ-GE	No	<u>2002 Celica Model Code</u>
2003	Toyota	Celica	2ZZ-GE	Yes	<u>2003 Celica Model Code</u>
2003	Toyota	Matrix	2ZZ-GE	No	<u>2003 Matrix Model Code</u>
2004	Toyota	Celica	2ZZ-GE	Yes	<u>2004 Celica Model Code</u>
2004	Toyota	Matrix	2ZZ-GE	No	<u>2004 Matrix Model Code</u>
2005	Toyota	Celica	2ZZ-GE	Yes	<u>2005 Celica Model Code</u>
2005	Toyota	Corolla	2ZZ-GE	No	<u>2005 Corolla Model Code</u>
2005	Toyota	Matrix	2ZZ-GE	No	<u>2005 Matrix Model Code</u>
2006	Toyota	Corolla	2ZZ-GE	No	<u>2006 Corolla Model Code</u>
2006	Toyota	Matrix	2ZZ-GE	No	<u>2006 Matrix Model Code</u>
2006	Lexus	GS300	3GR-FSE	Yes	<u>2006 GS300 Model Code</u>
2004	Lexus	ES330	3MZ-FE	Yes	<u>2004 ES330 Model Code</u>
2004	Lexus	RX330	3MZ-FE	Yes	<u>2004 RX330 Model Code</u>
2004	Toyota	Camry	3MZ-FE	Yes	<u>2004 Camry Model Code</u>
2004	Toyota	Highlander	3MZ-FE	Yes	<u>2004 Highlander Model Code</u>
2004	Toyota	Sienna	3MZ-FE	Yes	<u>2004 Sienna Model Code</u>
2004	Toyota	Solara	3MZ-FE	Yes	<u>2004 Solara Model Code</u>
2005	Lexus	ES330	3MZ-FE	Yes	<u>2005 ES330 Model Code</u>
2005	Lexus	RX330	3MZ-FE	Yes	<u>2005 RX330 Model Code</u>
2005	Toyota	Camry	3MZ-FE	Yes	<u>2005 Camry Model Code</u>
2005	Toyota	Highlander	3MZ-FE	Yes	<u>2005 Highlander Model Code</u>
2005	Toyota	Sienna	3MZ-FE	Yes	<u>2005 Sienna Model Code</u>
2005	Toyota	Solara	3MZ-FE	Yes	<u>2005 Solara Model Code</u>
2006	Lexus	ES330	3MZ-FE	Yes	<u>2006 ES330 Model Code</u>
2006	Lexus	RX330	3MZ-FE	Yes	<u>2006 RX330 Model Code</u>
2006	Lexus	RX400h	3MZ-FE	Yes	<u>2006 RX400h Model Code</u>
2006	Toyota	Camry	3MZ-FE	Yes	<u>2006 Camry Model Code</u>
2006	Toyota	Highlander	3MZ-FE	Yes	<u>2006 Highlander Model Code</u>
2006	Toyota	Highlander HV	3MZ-FE	Yes	<u>2006 Highlander HV Model Code</u>
2006	Toyota	Sienna	3MZ-FE	Yes	<u>2006 Sienna Model Code</u>
2006	Toyota	Solara	3MZ-FE	Yes	<u>2006 Solara Model Code</u>
2007	Lexus	RX400h	3MZ-FE	Yes	<u>2007 RX400h Model Code</u>
2007	Toyota	Highlander	3MZ-FE	Yes	<u>2007 Highlander Model Code</u>
2007	Toyota	Highlander HV	3MZ-FE	Yes	<u>2007 Highlander HV Model Code</u>
2007	Toyota	Solara	3MZ-FE	Yes	<u>2007 Solara Model Code</u>
2008	Lexus	RX400h	3MZ-FE	Yes	<u>2008 RX400h Model Code</u>

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## Toyota Vehicles with ETCS-I

2008	Toyota	Highlander HV	3MZ-FE	Yes	2008 Highlander HV Model Code
2008	Toyota	Solara	3MZ-FE	Yes	2008 Solara Model Code
2009	Toyota	Highlander HV	3MZ-FE	Yes	2009 Highlander HV Model Code
2010	Toyota	Highlander HV	3MZ-FE	Yes	2010 Highlander HV Model Code
1999	Toyota	Tacoma	3RZ-FE	No	1999 Tacoma Model Code
2000	Toyota	Tacoma	3RZ-FE	No	2000 Tacoma Model Code
2001	Toyota	Tacoma	3RZ-FE	No	2001 Tacoma Model Code
2002	Toyota	Tacoma	3RZ-FE	No	2002 Tacoma Model Code
2003	Toyota	Tacoma	3RZ-FE	No	2003 Tacoma Model Code
2004	Toyota	Tacoma	3RZ-FE	No	2004 Tacoma Model Code
1999	Toyota	RAV4	3S-FE	No	1999 RAV4 Model Code
2000	Toyota	RAV4	3S-FE	No	2000 RAV4 Model Code
2007	Toyota	Avanza	3SZ-VE	No	2007 Avanza Model Code
2008	Toyota	Avanza	3SZ-VE	No	2008 Avanza Model Code
2009	Toyota	Avanza	3SZ-VE	No	2009 Avanza Model Code
2010	Toyota	Avanza	3SZ-VE	No	2010 Avanza Model Code
2009	Toyota	Sequoia	3UR-FBE	Yes	2009 Sequoia Model Code
2009	Toyota	Tundra	3UR-FBE	Yes	2009 Tundra Model Code
2010	Toyota	Sequoia	3UR-FBE	Yes	2010 Sequoia Model Code
2010	Toyota	Tundra	3UR-FBE	Yes	2010 Tundra Model Code
2007	Toyota	Tundra	3UR-FE	Yes	2007 Tundra Model Code
2008	Lexus	LX570	3UR-FE	Yes	2008 LX570 Model Code
					2008 Land Cruiser Model
2008	Toyota	Land Cruiser	3UR-FE	Yes	Code
2008	Toyota	Sequoia	3UR-FE	Yes	2008 Sequoia Model Code
2008	Toyota	Tundra	3UR-FE	Yes	2008 Tundra Model Code
2009	Lexus	LX570	3UR-FE	Yes	2009 LX570 Model Code
					2009 Land Cruiser Model
2009	Toyota	Land Cruiser	3UR-FE	Yes	Code
2009	Toyota	Sequoia	3UR-FE	Yes	2009 Sequoia Model Code
2009	Toyota	Tundra	3UR-FE	Yes	2009 Tundra Model Code
2010	Lexus	LX570	3UR-FE	Yes	2010 LX570 Model Code
					2010 Land Cruiser Model
2010	Toyota	Land Cruiser	3UR-FE	Yes	Code
2010	Toyota	Sequoia	3UR-FE	Yes	2010 Sequoia Model Code
2010	Toyota	Tundra	3UR-FE	Yes	2010 Tundra Model Code
2001	Lexus	GS430	3UZ-FE	Yes	2001 GS430 Model Code
2001	Lexus	LS430	3UZ-FE	Yes	2001 LS430 Model Code
2002	Lexus	GS430	3UZ-FE	Yes	2002 GS430 Model Code
2002	Lexus	LS430	3UZ-FE	Yes	2002 LS430 Model Code
2002	Lexus	SC430	3UZ-FE	Yes	2002 SC430 Model Code
2003	Lexus	GS430	3UZ-FE	Yes	2003 GS430 Model Code
2003	Lexus	LS430	3UZ-FE	Yes	2003 LS430 Model Code
2003	Lexus	SC430	3UZ-FE	Yes	2003 SC430 Model Code
2004	Lexus	GS430	3UZ-FE	Yes	2004 GS430 Model Code
2004	Lexus	LS430	3UZ-FE	Yes	2004 LS430 Model Code
2004	Lexus	SC430	3UZ-FE	Yes	2004 SC430 Model Code
2005	Lexus	GS430	3UZ-FE	Yes	2005 GS430 Model Code
2005	Lexus	LS430	3UZ-FE	Yes	2005 LS430 Model Code

**EXHIBIT B**

## Toyota Vehicles with ETCS-I

2005	Lexus	SC430	3UZ-FE	Yes	2005 SC430 Model Code
2006	Lexus	GS430	3UZ-FE	Yes	2006 GS430 Model Code
2006	Lexus	LS430	3UZ-FE	Yes	2006 LS430 Model Code
2006	Lexus	SC430	3UZ-FE	Yes	2006 SC430 Model Code
2007	Lexus	GS430	3UZ-FE	Yes	2007 GS430 Model Code
2007	Lexus	SC430	3UZ-FE	Yes	2007 SC430 Model Code
2008	Lexus	SC430	3UZ-FE	Yes	2008 SC430 Model Code
2009	Lexus	SC430	3UZ-FE	Yes	2009 SC430 Model Code
2010	Lexus	SC430	3UZ-FE	Yes	2010 SC430 Model Code
2006	Lexus	IS250	4GR-FSE	Yes	2006 IS250 Model Code
2007	Lexus	IS250	4GR-FSE	Yes	2007 IS250 Model Code
2008	Lexus	IS250	4GR-FSE	Yes	2008 IS250 Model Code
2009	Lexus	IS250	4GR-FSE	Yes	2009 IS250 Model Code
2010	Lexus	IS250	4GR-FSE	Yes	2010 IS250 Model Code
2010	Lexus	IS250C	4GR-FSE	Yes	2010 IS250C Model Code
1999	Toyota	Camry	5S-FE	No	1999 Camry Model Code
2000	Toyota	Camry	5S-FE	No	2000 Camry Model Code
2001	Toyota	Camry	5S-FE	No	2001 Camry Model Code
2001	Toyota	Solara	5S-FE	No	2001 Solara Model Code
2000	Toyota	Camry	5S-FNE	No	2000 Camry Model Code
2001	Toyota	Camry	5S-FNE	No	2001 Camry Model Code
1999	Toyota	Tacoma	5VZ-FE	No	1999 Tacoma Model Code
2000	Toyota	Tacoma	5VZ-FE	No	2000 Tacoma Model Code
2000	Toyota	Tundra	5VZ-FE	No	2000 Tundra Model Code
2001	Toyota	4Runner	5VZ-FE	Yes	2001 4Runner Model Code
2001	Toyota	Tacoma	5VZ-FE	No	2001 Tacoma Model Code
2001	Toyota	Tundra	5VZ-FE	No	2001 Tundra Model Code
2002	Toyota	4Runner	5VZ-FE	Yes	2002 4Runner Model Code
2002	Toyota	Tacoma	5VZ-FE	No	2002 Tacoma Model Code
2002	Toyota	Tundra	5VZ-FE	No	2002 Tundra Model Code
2003	Toyota	Tacoma	5VZ-FE	Yes	2003 Tacoma Model Code
2003	Toyota	Tundra	5VZ-FE	Yes	2003 Tundra Model Code
2004	Toyota	Tacoma	5VZ-FE	Yes	2004 Tacoma Model Code
2004	Toyota	Tundra	5VZ-FE	Yes	2004 Tundra Model Code
2007	Toyota	Avanza	K3-VE	No	2007 Avanza Model Code
2008	Toyota	Avanza	K3-VE	No	2008 Avanza Model Code
2009	Toyota	Avanza	K3-VE	No	2009 Avanza Model Code
2010	Toyota	Avanza	K3-VE	No	2010 Avanza Model Code

**EXHIBIT C**

**I. Subject Vehicles**

- A. The subject vehicles are described in Master Vehicle List attached hereto as Exhibit A.
- B. We are interested in all of the relevant Toyota engine families with ETCS systems, which we understand includes, but may not be limited to the following:
  - Toyota 2AR-FE
  - Toyota 3S-FE 2.0L I4 (1990–1991) for Camry (engines previously made in Japan and shipped in)
  - Toyota 5S-FE 2.2L I4 (1992–2001) for Camry
  - Toyota 2AZ-FE 2.4L I4 (2002–2009) for Camry and Camry Solara
  - Toyota 2AZ-FXE 2.4L I4/Electric Hybrid (2006–present) for Camry Hybrid
  - Toyota 1AR-FE and 2AR-FE 2.7 and 2.5 I4 (2009–present) for Camry (2AR) and Venza (1AR)
  - Toyota 3VZ-FE 3.0L V6 (1992–1994) for Camry
  - Toyota 1MZ-FE 3.0L V6 (1994–2004) for Camry, Avalon, and Sienna (made elsewhere but shipped in for 2004–2006)
  - Toyota 3MZ-FE 3.3L V6 (2004–2006) for 2004–2006 Camry SE and Camry Solara (made elsewhere but shipped in 2006–2008 for Camry Solara)
  - Toyota 2GR-FE 3.5L V6 (2006–present) for Camry, Avalon, and Venza
- C. Time Period – from 1998 to the present

**II. Key Design, Engineering, and Testing Documents**

- A. Scope
  - 1. The relevant documents for the subject vehicles from 1998 to present
  - 2. The relevant design, engineering, and testing documents for each level -- component level, subsystem level, and system/vehicle level
  - 3. As used in this document, the term document may include electronic documents provided via electronic media.
- B. Component Level Documents – All documents that describe, define, and/or specify the following types of components used in the subject Toyota vehicles. Over the timeframe in question, and for each variant of these components, we also hereby request all documents that identify any revisions or version history of each of these components:
  - 1. Electrical / Electronic
    - a. Connectors
      - 1.) Pins/Sockets
      - 2.) Housing/Shell/
      - 3.) Primary/Secondary locking mechanism(s)

- b. Wiring/Wiring harnesses (including wire type, wire gauges, wire color(s), part number(s), wire, insulation, and assembly specifications)
- c. Electronic Modules
  - 1.) Engine Control Module / Powertrain Control Module (ECM aka ECU, or PCM), including but not limited to the following:
    - a) Electrical schematic showing module interface(s) with vehicle wiring harness and other components.
    - b) Electrical schematic showing module internal construction and circuit schematic.
    - c) Printed Circuit board drawing showing component layout.
    - d) Printed circuit board drawing or files showing trace layout by later (Gerber files or equivalent).
    - e) Bill of Materials identifying all internal components, part numbers, and vendor(s).
    - f) Connector documents identifying connector dimensions, physical design, specifications, part number(s), vendor(s), pin locations and circuits, locking mechanisms, connection force(s), disconnect force(s), connection retention force(s)
    - g) Module environmental specifications.
  - 2.) Transmission Control Module), including but not limited to the following:
    - a) Electrical schematic showing module interface(s) with vehicle wiring harness and other components.
    - b) Electrical schematic showing module internal construction and circuit schematic.
    - c) Printed Circuit board drawing showing component layout.
    - d) Printed circuit board drawing or files showing trace layout by later (Gerber files or equivalent).
    - e) Bill of Materials identifying all internal components, part numbers, and vendor(s).
    - f) Connector documents identifying connector dimensions, physical design, specifications, part number(s), vendor(s), pin locations and circuits, locking mechanisms, connection force(s), disconnect force(s), connection retention force(s)
    - g) Module environmental specifications.

- 3.) Hybrid Vehicle Control ECU), including but not limited to the following:
  - a) Electrical schematic showing module interface(s) with vehicle wiring harness and other components.
  - b) Electrical schematic showing module internal construction and circuit schematic.
  - c) Printed Circuit board drawing showing component layout.
  - d) Printed circuit board drawing or files showing trace layout by later (Gerber files or equivalent).
  - e) Bill of Materials identifying all internal components, part numbers, and vendor(s).
  - f) Connector documents identifying connector dimensions, physical design, specifications, part number(s), vendor(s), pin locations and circuits, locking mechanisms, connection force(s), disconnect force(s), connection retention force(s)
  - g) Module environmental specifications.
- 4.) Anti-Lock Brakes (ABS)/Traction/Stability Control ECU(s), including but not limited to the following:
  - a) Electrical schematic showing module interface(s) with vehicle wiring harness and other components.
  - b) Electrical schematic showing module internal construction and circuit schematic.
  - c) Printed Circuit board drawing showing component layout.
  - d) Printed circuit board drawing or files showing trace layout by later (Gerber files or equivalent).
  - e) Bill of Materials identifying all internal components, part numbers, and vendor(s).
  - f) Connector documents identifying connector dimensions, physical design, specifications, part number(s), vendor(s), pin locations and circuits, locking mechanisms, connection force(s), disconnect force(s), connection retention force(s)
  - g) Module environmental specifications.
  - h) Identify any advanced ESC or ABS system features used on any Toyota vehicles (1998 to present) that are intended to improve brake function during loss of power brake assist.
  - i) Provide any and all information related to the Electronic Stability Control (ESC) Systems and

AntiLock Braking Systems (ABS) design of the subject vehicles.

- 5.) Occupant Restraint/Airbag Control Module), including but not limited to the following:
  - a) Electrical schematic showing module interface(s) with vehicle wiring harness and other components.
  - b) Electrical schematic showing module internal construction and circuit schematic.
  - c) Printed Circuit board drawing showing component layout.
  - d) Printed circuit board drawing or files showing trace layout by layer (Gerber files or equivalent).
  - e) Bill of Materials identifying all internal components, part numbers, and vendor(s).
  - f) Connector documents identifying connector dimensions, physical design, specifications, part number(s), vendor(s), pin locations and circuits, locking mechanisms, connection force(s), disconnect force(s), connection retention force(s)
  - g) Module environmental specifications.
- 6.) Electronic Throttle Control System (ETC or ETCS)
  - a) Functional requirements specifications for the ETC system. This is required in order to understand what the system is supposed to do and to what specifications required. To know exactly what the designers were trying to accomplish helps us to understand the behaviors that we observe.
  - b) Functional requirements specifications for peripheral components and modules that request and/or control torque such as ABS, ESP, etc, as above.
  - c) Database and associated tools for ECM software requirements documents including engine control and transmission control systems including Matlab/Simulink/Stateflow models. These documents represent the blueprints of the ECM software. They enable us to understand exactly the design intent of the ECM control functions. They show what the software is supposed to: what, how, and when.
  - d) ECM source code/software database, and associated tools and readers are required to review implementation of the ECM software requirements.

- e) ECM software change request and approval process database is required to understand what items changed and why.
- f) A list of all known issues or "issues database" is requested for ECM and ETC development issues including software and hardware. Detail on nature of issues including resolution information. This information is needed to provide insight as to the areas of the system that could be suspect.
- g) Access to database and tools for ECM calibration data for engine/transmission software including report generators and part number descriptions. This is a necessary adjunct to the software specifications in order to understand the control functionality within Toyota systems.
- h) Copies of any proprietary software tools, access codes, and passwords to access database information, or to read test data, or other document viewers. This is necessary to be able to view all information contained in the requested databases.

d. Sensors -

- 1.) Accelerator Pedal Position Sensor (APPS)
- 2.) Throttle Position Sensor (TPS)
- 3.) ABS Sensor
- 4.) Brake Pedal Stroke Sensor (Hybrid)
- 5.) Mass Air Flow Sensor (MAF)

2. Electro-Mechanical

- a. Throttle body assembly
- b. Accelerator pedal assembly
- c. Cruise Control System Components
- d. Brake pedal assembly
- e. Anti Lock Braking System (ABS)
- f. Electronic Controlled Transaxle
- g. Automatic Heating Ventilating and Air Conditioning System (HVAC)
- h. Emissions Control components

3. Mechanical

- a. Throttle Body
- b. Brake Pedal assembly
- c. Floor Mats
  - 1.) OEM Carpeted Floor Mats
  - 2.) OEM All-weather Style Floor Mats
  - 3.) OEM Floor Mat Retaining hooks / clips

4. Software/Firmware – For any components, modules, or systems utilizing any of a microprocessor, microcontroller, Digital Signal

Processor (DSP), or other computational hardware, dedicated software and/or firmware is necessary to control component operation. This section identifies our request for documents related to the evolution, development, testing, performance, modification, reliability, and/or robustness of such software/firmware in each of the applicable systems/modules.

- a. Functional requirements/goals/objectives/specifications
- b. Algorithm development history
- c. Prototyping history
- d. Concept level testing
- e. Requirements
  - 1.) Pseudo-Code
  - 2.) Matlab/Simulink/Stateflow
- f. Source Code with notes/notation
  - 1.) Manual coding
  - 2.) Autocoding
- g. Subsystem testing/Unit testing
- h. Development/Production Version evolution
  - 1.) Beta-testing – full system test
  - 2.) Production build
    - a) Calibration sets
      - i) Engine
      - ii) On Board Diagnostics (OBD)
      - iii) Electronic Throttle Control (ETC)
      - iv) Reliability
      - v) Part number electrical engineering
      - v) Document control system for the revision and release of subsequent revisions/versions.
      - vi) Actual revision history of software/firmware for each applicable module.
- i. Software validation criteria for all electronic control modules (ECMs/ECUs), methodology for determining validation criteria, and actual validation history for each module. (1998 to present).
- j. Programmers notes, algorithm, logic diagram, flowchart, matrix and other documentation describing the software and software programming process for Engine Control Modules, Anti-Lock Braking System Control Modules, Electronic Throttle Control Systems, Electronic Stability Control Modules, and Occupant Restraint/Airbag Control Modules.
- k. List of all software revisions, versions, updates, and changes for Engine Control Modules, Electronic Throttle Control Systems, Anti-Lock Braking Modules, Electronic

Stability Control Modules, and Occupant Restraint/Airbag Control Modules, including who requested each such revision/change, and who authorized each such revision/change.

C. System Level Documents – Plaintiffs need documents regarding the following systems:

1. ETCS
2. Cruise Control
3. Transaxle
4. Braking
5. Vehicle Stability Control
6. Airbag
7. Interior Packaging

D. Vehicle Level Documents

1. Vehicles with ETCS

E. Overview of Key Documents/Data

1. Design goals for components (for all P.C. boards, electronic modules, subsystems, and systems)
  - a. Performance to these goals
  - b. Test results
2. Failure Mode Effects Analysis (FMEA or Toyota's equivalent versions) related to both design and process failure analysis.
  - a. Changes in components, P.C. boards, modules, subsystems and systems made as a result of these studies
  - b. Copies of the test data taken in studies resulting from this work
3. Incoming inspection reports, results, etc. obtained during initial testing by Toyota or other recipients of vehicles in the US
4. Parts database including the complete testing history, raw data, etc. for each part associated with ECUs and ETCS
5. All failures in components, boards, modules, subsystems, and systems in the design/development phase of the electronic systems
6. Flow diagrams and software for the operations of the components, subsystems, and system
7. All schematics, PCB, layouts, layers, bill of material, test plan functionality/operation, including Date codes “decoding” and FMEAs (Toyota's version)
8. Sensors: Types, operation, how they interface to the systems in the subject vehicles
9. Connectors and any failures associated with them
10. Documents associated with the throttle body, its specification, design, manufacture, operation, faults, and failures

F. Specific Documents/Data (if not included in prior sections)

1. Electrical circuit schematics
2. Printed Circuit Board (PCB) drawings (or electronic equivalent)

3. Printed Circuit Board trace layout by layer (via Gerber files or equivalent).
4. Printed Circuit Board Test plan
5. Bill of Materials for entire assembly, including all sub-assemblies.
6. Technical Specifications documents
7. Assembly instructions for each station of process of assembly
8. Packaging drawings, descriptions, specifications
9. A list of all design revisions approved and released for each of the above modules.
10. Design, performance, and/or functional requirements for Electronic Throttle Control (ETCS) systems
11. Design, performance, and/or functional requirements for peripheral components and modules that request and/or control torque (e.g., ABS, ESP, etc.)
12. Documents describing Toyota's Revision Control System.
13. All PC Board Gerber Files (include fabrication details).
14. Assembly Instructions (Notes from Engineering to Manufacturing) including files sent to any sub-contractors, vendors, or other involved parties.
15. Test procedure used at vendor and installation at Toyota assembly plant.
16. Engineering diagrams / drawings for the ETCS system and every engineering change instruction form or document
17. Design Check Sheets for electronic throttle control system including all of the associated sensors, circuits, connections and wiring for each engine family from 1998 to the present.
18. Electronic throttle control design specification for Toyota's original and link-less systems from its introduction to the present for each Toyota model and engine family.
19. Software requirements documents for engine control and transmission control systems including Matlab/Simulink/Stateflow models.
20. Requirements database for ECM software and hardware.
21. Requirements (functional) for peripheral components modules that request and control torque such as ABS, ESP, etc.
22. Source code / software database.
23. Software change request and approval process database.
24. Issues database -- for development issues / software issues including resolution information. Software and hardware
25. Copies of proprietary software tools to access database information or to read test data or other document viewers.
26. ETC position control algorithm details and performance analysis.
27. Calibration listings for ECM for engine / transmission software.
28. ECM schematics and wiring harness diagrams.
29. Test plans and Design Validation Plans and Reports (DVP&R) or functionally equivalent documents.

30. FMEA (Failure Modes and Effects Analysis) or functionally equivalent documents.
31. Description of all test procedures relating to ETC systems.
32. Validation reports including test trip summary and environmental testing reports.
33. ECM processor loading study.
34. Organizational charts of the product development and advanced systems engineering areas.
35. List of software engineers.
36. List of development engineers.
37. List of suppliers for all components that control engine torque.
38. Sign-off / Release process description and documents.
39. Development process and timelines description and details.
40. Product performance specifications sheets for ETC throttle body, pedal, and ECM.
41. Drive quality and performance targets.
42. Ride/Drive feedback / reports.
43. Competitive product benchmarking reports.
44. Supply chain list for all components of the ECU.
45. Original test plans on ETCS (Electronic Throttle Control Systems with Intelligence)
46. Magnetic field strength measurements
  - a. inside the cabin
  - b. under the hood
47. ECM software documentation including, but not limited to,
  - a. Programming conventions
  - b. Design documents
  - c. Fault-handling strategy
  - d. Software architecture
  - e. Timing analysis
  - f. Timing management
  - g. Interrupt management
  - h. Test plans including but not limited to
    - 1.) Coverage
    - 2.) Unit testing
    - 3.) Subsystem testing
    - 4.) System testing
    - 5.) Idle speed control tests
    - 6.) Cruise control tests
    - 7.) Vehicle stability control tests
    - 8.) Transmission control tests
  - i. Code walk-through conventions and analysis results
  - j. Regression tests
  - k. Detailed functional descriptions including, but not limited to,
    - 1.) Air flow control

- 2.) Cruise control
- 3.) Fuel flow control
- 4.) Idle speed control
- 5.) Transmission shift control
- 6.) Vehicle stability control
- 7.) Accelerator pedal position sensor range checks and assumptions
- 8.) Throttle position sensor range checks and assumptions
- 9.) Learning algorithms for sensor calibration including, but not limited to,
  - a.) Accelerator Pedal Position Sensor (APPS)
  - b.) Throttle Position Sensor (TPS)

48. ECM hardware documentation including, but not limited to,

- a. Design documents
- b. Fault-handling strategy
- c. Test plans including, but not limited to,
  - 1.) Coverage
  - 2.) Unit testing
  - 3.) Subsystem testing
  - 4.) System testing
  - 5.) EMI testing and assumptions

49. ETCS user interface analysis

- a. General usability and
- b. Usability under stress conditions
  - 1.) Engine turn-on/turn-off on keyed and button starts
  - 2.) Transmission shift (sport and automatic shift)

50. Toyota's methodology for designing and implementing the ETCS system and Toyota's decision to incorporate the ETCS system into the Subject vehicles, including:

- a. Any design or production deadlines Toyota imposed as part of this process.
- b. The basis for Toyota's decision to explore throttle by wire systems.
- c. The specific design limitations, if any, Toyota sought to overcome by transitioning to the use of throttle by wire systems in its vehicles.
- d. Any cost benefit analysis Toyota considered as part of its decision to implement throttle by wire in concept, and any such analysis performed specific to the ETCS system that was ultimately incorporated into Subject vehicles.
- e. Any safety data Toyota considered as part of its decision to implement throttle by wire in concept and any such analysis performed specific to the ETCS system that was ultimately incorporated into Subject vehicles.

- f. Any alternative designs, proto types, and/or design comparatives Toyota considered as part of its decision to implement throttle by wire in concept, and any such analysis performed specific to the ETCS system that was ultimately incorporated into the Subject vehicles.
- g. Any design or performance criteria forming a basis as part of its decision to implement throttle by wire in concept, and any such analysis performed specific to the ETCS system that was ultimately incorporated into the Alberto Vehicle.
- h. Any testing, critical analysis, or real-world performance data Toyota considered as part of your decision to implement throttle by wire in concept, and any such analysis performed specific to the ETCS system that was ultimately incorporated into the Subject vehicles.
- i. Any cost criteria Toyota considered as part of your decision to implement throttle by wire in concept, and any such analysis performed specific to the ETCS system that was ultimately incorporated into the Alberto Vehicle.
- j. Toyota specific protocol, if any, from theory to production, implementing the ETCS system, and whether or not such protocol deviated from any prior Toyota design practices.
- k. Any design limitations and/or safety concerns you identified during the course of designing, implementing, and producing the ETCS system.

51. FMEA's (failure mode and effects analyses), fault tree analyses, Ishikawa diagrams, and other failure analyses, (including, but not limited to, inductive, deductive, and brainstorming analyses) concerning subject vehicles.

52. Documents showing how the ETCS respond to electromagnetic disturbances reasonably likely to be experienced over the life of the vehicle due to both electromagnetic activity in the vehicle itself and in the external environment.

53. Documents showing how ETCS respond to electromagnetic disturbances reasonably likely to be experienced over the life of the vehicle due to both electromagnetic activity in the vehicle itself and in the external environment.

54. Every failsafe mechanism and/or design feature, if any, installed in a Subject vehicle that was or were intended to assist a driver of a Subject vehicle equipped with ETCS to maintain control in the event of UAE.

55. Toyota Soldering Standards (Design and Manufacturing) for all the model years of vehicles in this litigation.

56. The solder used during this process (lead/lead free) and whether/when the IPC directive was followed? (see ipc.org)

57. Any advanced ESC or ABS system features used on any subject vehicles that are intended to improve brake function during loss of power brake assist.
58. Software Flow Charts, including support documentation, and/or notes for each revision of software related to the operation of Electronic Throttle Controls (ETC) and Engine Control Module(s) (ECUs) in all Toyota and Lexus models from 1998 to present for each model, engine, or option combination offered.
59. The testing, qualification, validation, and verification of software used in all Toyota and Lexus models for Electronic Throttle Control (ETC) and Engine Control Module(s) (ECUs) from 1998 to present for each model, engine, or option combination offered.
60. The study, testing, evaluation, benchmarking, or other competitive or comparative analysis performed by Toyota or Lexus or their designated contractors regarding Electronic Throttle Control (ETC) type systems as used on other manufacturer's vehicles.

### **III. Manufacturing/Quality Control**

- A. Scope
  1. The relevant documents for the subject vehicles from 1998 to present
  2. The relevant manufacturing and quality control documents for each level – component level, system level, and vehicle level
- B. Key Manufacturing/Quality Control Documents
  1. Toyota's application of the "Toyota Production System" (TPS) to its design, manufacture, and quality control process relative to the subject vehicles
  2. Toyota's policy and procedure for resolving in-process manufacturing defect issues, such as 10-D charts, Corrective Action Plans, or Toyota equivalents.
  3. Toyota's policies and procedures for addressing quality "spills"
  4. The manufacturing defects found in any subject vehicles and any corrective action taken by Toyota or its affiliates/suppliers
  5. The qualified vendors used by Toyota in the relevant modules in the subject vehicles since 1998
  6. Toyota supplier audits and quality history for their suppliers of the relevant modules in the subject vehicles since 1998

7. Toyota's evaluation or analysis of testing done by suppliers of the ETCS systems in the subject vehicles, including but not limited to Denso
8. Compliance with or potential breaches of control by Denso or other suppliers of the ETCS systems in the subject vehicles
9. Communications between Toyota and Denso and/or other suppliers of the ETCS systems regarding ETCS in the subject vehicles, including regarding all test schedules, test results, analyses, and sign offs
10. Toyota Soldering Requirements/Standards for design and manufacturing of electronics from model year 1998 to present.
11. Type of solder used in electronic module manufacturing of Toyota electronic modules from model year 1998 to present (i.e. containing lead, or lead-free). When was the IPC directive followed (see [www.ipc.org](http://www.ipc.org)).

#### **IV. Complaints/Claims/Failure Analysis In Subject Vehicles**

- A. Toyota's containment process for field issues
- B. Toyota's Material Cost Management
- C. Failure Analysis Process
  1. Design Failure Mode Effects Analysis (DFMEA) documents or Toyota equivalent documents relating to potential design defects and their impact on failure mode severities of components relating to Engine Control Modules (ECUs), Electronic Throttle Control (ETC) components, and Electronic Throttle Body assemblies.
  2. Process Failure Mode Effects Analysis (PFMEA) documents or Toyota equivalent documents relating to potential manufacturing process defects and their impact of failure mode severities of processes during the manufacturing of Engine Control Modules (ECUs), Electronic Throttle Control (ETC) components, and Electronic Throttle Body assemblies.
  3. The process and the equipment used to access any event data stored in any Event Data Recorder (EDR) devices, or event data recorder functions contained within any electronic modules
  4. Reports of the triggering of a Diagnostic Trouble Code ("DTC") P2121 in Subject vehicles, any investigation into the triggering of a DTC P2121, and any corrective action taken as a result.
  5. All documents, reports, or other materials documenting reports of the triggering of a Diagnostic Trouble Code ("DTC") P2121 in Class Vehicles, any investigation into the triggering of a DTC P2121, and any corrective action taken as a result.
  6. All documents, reports, or other materials documenting reports of the triggering of a Diagnostic Trouble Code ("DTC") pertaining to or associated with the electronic throttle control system, any investigation into the triggering of a DTC 2121, and any corrective action taken as a result.

7. Reports of the triggering of a Diagnostic Trouble Code (“DTC”) pertaining to or associated with the electronic throttle control system, any investigation into the triggering of a DTC P2121, and any corrective action taken as a result.
8. Tests conducted on ETCS when subject vehicles reported sudden unintended acceleration
9. Original failure analysis of ETCS (fault-tree analysis in particular) including, but not limited to:
  - a. Analysis of independent faults
  - b. Analysis of common-mode failures
  - c. Reliability estimates
  - d. Reliability statistics
  - e. Sensor failure-mode analysis
  - f. temperature impact analysis
  - g. stress impact analysis
  - h. shear test analysis
  - i. magnetic field impact analysis

D. Diagnostics

1. DTC Codes
  - a. P-Codes
    - 1.) Definitions
    - 2.) Software requirements linked to each definition
    - 3.) Calibration data
  - b. U-Codes
    - 1.) Definitions
    - 2.) Software requirements linked to each definition
    - 3.) Calibration
  - c. C-Codes
    - 1.) Definitions
    - 2.) Software requirements linked to each definition
    - 3.) Calibration
  - d. B-Codes
    - 1.) Definitions
    - 2.) Software requirements linked to each definition
2. Diagnostic Control Code (DTC) approach
  - a. What is considered and not considered
    - 1.) Occurrence statistics
    - 2.) Adaptation/calibration strategies for
      - a) Different operating temperatures
      - b) Different humidity conditions
      - c) Aging of vehicle
      - d) Different maintenance habits on vehicles
  - b. Part repair/replacement statistics on
    - 1.) Accelerator pedal assembly
    - 2.) Air flow sensors
    - 3.) Cruise control module

- 4.) CAN network
- 5.) ECM
- 6.) Electrical/Wiring Connectors
- 7.) Fuel flow sensors
- 8.) MUX network
- 9.) Throttle body assembly
- 10.) Throttle body sensor
- 11.) Transmission control module

E. Event Data Recorder (EDR)

1. EDR Readout Tools used in the United States and other countries.
2. SRS Airbag Event Data Recorder Readout Tool Operation Manuals
3. The software design of the EDR Readout Tool
4. Non-software changes made to each and every version of the Readout Tool
5. The changes, corrections, deletions or additions made to each and every version of the Readout Tool Operation Manual
6. A list of the hexadecimal data recorded by the EDR.
7. Documents used to manually read and validate the hexadecimal data recorded by the EDR and readout by the EDR Readout Tool
8. The Toyota departments that designed and manufactured the EDR Readout Tools
9. The Toyota employees involved in the design and manufacture of the EDR Readout Tools
10. A list (including make, model and year) of the relevant vehicles sold in the United States that have an EDR installed and the data each EDR records
11. A list (including make, model and year) in the relevant vehicles sold outside the US that has an EDR installed and the data each EDR records
12. The Passwords used for the security release on the EDR tool
13. The Accelerator Full Open Voltage Values used for input into the EDR Readout Tool
14. The testing done to validate the operation and accuracy of the EDR Readout Tool
15. The testing done to validate the operation and accuracy of the EDR Readout Tool
16. Details of all EDR downloads Toyota representatives have performed in the United States

- F. Warranty Replacements**
  - 1. Field warranty claims involving the aforementioned modules and/or assemblies
  - 2. Out-of-warranty service replacement of the aforementioned modules and/or assemblies on customer vehicles.
  - 3. Documentation regarding all ECU's that were returned to the manufacturer from Toyota as defective (RMA).
  - 4. Documentation for all ECU's that were returned to the manufacturer/vendor from Toyota as defective via Returned Material Authorizations (RMA), including analysis or report of failure mechanisms from the manufacturer/vendor.
- G. Early Warning Reporting (EWR)**
  - 1. The 37,900 UA-related complaints Toyota reported to Congress that it had received via phone complaint line.
  - 2. Protocols and supporting materials for inspection of alleged UA incidents, pre- and post-SMART team. This should go back as far as Toyota has examined UA and set protocols for vehicle inspections / owner and witness interviews.
  - 3. The defect and crash surveillance systems at Toyota
  - 4. The structure of the EWR committee, team and or department at Toyota.
  - 5. All field investigations conducted by Toyota, or its agents or contractors on vehicles that involved an alleged unintended acceleration incident from 1998 to the present.
  - 6. The status and findings regarding any buy-backs for vehicles in which there were allegations of unintended acceleration from 1998 to the present.
  - 7. Toyota Dealer UA Process Flow Scenario #1 or Scenario #2 inspections performed on vehicles where the owner complained of a sudden acceleration event.
  - 8. Toyota Unintended Acceleration (UA) Interview Guides that were filled out in response to an owner's complaint of an unintended acceleration event.
- V. Service**
  - A. Dealer communications**
  - B. Dealer networks**
  - C. UA scenario evaluations**
  - D. Field Technical Specialist**
    - 1. Training
    - 2. Investigations
    - 3. Communications
  - E. SMART**
    - 1. Training
    - 2. Investigations
    - 3. Communications
- VI. Potential UA Incidents**

- A. US UA Incidents
  - 1. Written or oral complaints regarding potential UA incidents in subject vehicles, including all documents kept by Toyota and its dealers
  - 2. Toyota's internal communications and analyses regarding potential UA incidents or problems in subject vehicles
  - 3. Changes, modifications, replacements, or recalls carried out by Toyota to address potential UA incidents
- B. Foreign UA Incidents
  - 1. Written or oral complaints regarding potential UA incidents in subject vehicles outside of the United States, including all documents kept by Toyota and its dealers
  - 2. Toyota's internal communications and analyses regarding potential UA incidents or problems in subject vehicles
  - 3. Changes, modifications, replacements, or recalls carried out by Toyota to address potential UA incidents
- C. Government Investigations
  - 1. US investigations
    - a. Senate Committee on Commerce, Science and Transportation
    - b. House Committee on Energy and Commerce
    - c. House Committee on Oversight and Government Reform
    - d. All DOT / NHTSA investigations of unintended acceleration and all related inquiries (i.e., Recall Queries, Timeliness Queries, EWR-based investigations, Inspector General inquiries).
    - e. Attorney General Cuomo's Grand Jury investigation
  - 2. Foreign-based investigations
- D. All Toyota Recalls/Replacements In Subject Vehicles Since 1998
- E. Exponent Testing
  - 1. Vehicles – the date, title, vehicle model year and model, author(s), engineer(s), test methodology and conclusion(s) each and every test conducted by Exponent from December 1, 2009 to the present.
  - 2. Test Results – every test report, test media, test graph, test matrix, and/or and test document conducted by Exponent from December 1, 2009 to the present
- F. Toyota's UA Process Flow
  - 1. Scenario 1
  - 2. Scenario 2

**VII. Brake Override**

- A. Design
  - 1. Every vehicle not currently equipped with the brake override or brake to idle fail safe feature that cannot be reflashed or retrofitted because of software or hardware limitations in the onboard system.
- B. Testing

- C.
  - 1. Testing, benchmarking and / or analyses of brake override systems.
  - Recall/Retrofit
  - 1. The methodology and/or processes Toyota employs to implement the brake override retrofit
  - 2. All testing related to the brake override feature described in recall 09V388.
  - 3. The person(s) with sign off responsibility for the brake override feature that described in recall 09V388.
  - 4. Testing related to the brake override feature that is part of described in recall 09V388.
  - 5. Design Check Sheet, Failure Modes and Effects Analyses (FMEA), or like documents related to the brake override feature described in recall 09V388.

### **VIII. Dealer Materials, Sales, Marketing, and Public Statements**

- A. Purchase/Leasing Documents
  - 1. Contract-related documents
  - 2. Disclosures
  - 3. Vehicle manuals and advisories
- B. Advertisements
  - 1. Exemplars of all print, television, and electronic/web-based advertising or marketing documents regarding Toyota or subject vehicles since 1998
  - 2. Exemplars of single-model brochures for all worldwide markets in which subject vehicles were sold
  - 3. Exemplars of all multi-model or full-model range brochures for all worldwide markets in which subject vehicles were sold
  - 4. Scripts of all radio and television recordings regarding Toyota or subject vehicles since 1998
  - 5. Exemplars of all story boards associated with broadcast marketing for all worldwide markets in which vehicles were sold
  - 6. All marketing that addresses "Toyota in the World" and/or any corporate citizenship policies, guidelines, or practices
  - 7. All versions of "The Automotive Industry – Toyota and Japan"
- C. Website
  - 1. Copies of Toyota-affiliated websites since 1998
  - 2. Exemplars of all web-based marketing for all worldwide markets in which vehicles were sold
- D. Direct Communications with Customers (Pre- and Post-Recall) By Toyota or its Dealers
  - 1. Letters to and from customers
  - 2. Email communications to and from customers
  - 3. Technical Service Bulletins
  - 4. Customer Service
    - a. Telephone logs/notes
    - b. Telephone scripts

5. All dealer training materials, including books, seminars, presentations, brochures, videos, web-based documents,
- E. Dealer/Service Information
  1. Any and all spare or replacement parts lists, and spare or replacement catalogues used by Toyota for TOYOTA and LEXUS dealership and service network.
  2. Any and all service training manuals or materials issued by Toyota for TOYOTA and LEXUS dealership and service network use for the subject vehicles.
  3. Any and all repair and service manuals issued by Toyota for TOYOTA and LEXUS dealership and service network use for subject vehicles.
- F. Press Releases
  1. Pre July, 2009 press releases regarding Toyota or subject vehicles
  2. All post July 2009 press releases, including those dealing with potential UA, floor mat, or "sticky pedal" problems or recalls
- G. Other Public Statements
  1. Testimony by Toyota representatives or spokespersons
  2. Interviews by Toyota representatives or spokespersons
  3. Talking points for Toyota representatives or spokespersons

## **IX. Key Toyota Databases**

- A. Research and Development databases
- B. Design and Engineering databases
  1. Engineering Book of Knowledge
- C. Testing databases
- D. Customer Support - Defect / Complaint Surveillance databases
  1. Field Evaluation
  2. Customer Quality Engineering
  3. Compliance – EWR
  4. SMART (Swift Market Analysis Recovery Team)
  5. North American Global Quality Committee
  6. Vehicle on-board data storage
    - a. EDR
    - b. ECM
    - c. CAN Bus
    - d. Operation History Data
    - e. Other
- E. Dealer-related databases
- F. Marketing databases
- G. Some knowing databases are:
  1. Toyota Customer Support
    - a. APS (NAPLD)
    - b. Claims Processing System (CPS)
    - c. Knowledge Management (KM)
    - d. Service Parts Information System (SPIS)

- e. T3 - Technical Assistance System (TAS)
- f. T3 - Toyota Quality Communication Network (TQCN)
- g. T3 - Technical Information System (TIS) -- Dealer / Public
- h. TCS Prg
- i. Toyota Technical Education Network (T-TEN)
- j. TMMC Parts Invoicing
- k. Warranty Parts Supplier

2. Toyota Automotive
  - a. Dealer Daily
  - b. Dealer Daily Mexico
  - c. Dealer Daily Training
  - d. Fleet
  - e. Lexus Survey Redesign
  - f. Logistics
  - g. Supplier TRAM
3. TMS Business Support Services
  - a. Any Level system
4. TMS Information Systems
  - a. Call Accounting
  - b. Clarity
  - c. Wireless
5. EWR Compliance
  - a. TeamConnect

**X. Document/Data Retention and Preservation**

- A. Policies and practices -- The policies and practices of each department, division, committee, and group regarding document and data preservation and implementation of any litigation holds relevant to UA incidents
- B. Particular Document/Data Preservation Issues
  1. Event Data Recorder (EDR) – data recorded by this system should be preserved, including data regarding:
    - a. engine speed
    - b. braking
    - c. vehicle speed
    - d. position of accelerator pedal
    - e. position of transmission shift level
    - f. seat belt usage
    - g. SRS airbag deployment
    - h. SRS airbag diagnostic data
  2. CAN (Controller Area Network) Bus (for Toyota vehicles 2007 and after and Hybrids 2004 and after)
  3. ECM/ECU – data recorded by this system should be preserved, including data regarding:
    - a. Adaptive parameters such as fueling, airflow, idle speed, A/C, and friction transmission
    - b. For hybrids, operational history data

4. TECHSTREAM diagnostic tool – data recorded by this tool should be preserved, including Throttle Learn Data and Pedal Sweep Test
5. ETCS – this should be preserved by Toyota in the condition at the time of a

**XI. Toyota's Organizational Structure**

- A. Corporate Structure – Plaintiffs would like organizational charts from 1998 to the present for the following entities:
  1. TTC U.S.A.
  2. TTC Headquarters Tokyo
  3. TEMA
  4. TMC
  5. TMS
  6. TMNA, Inc.
- B. Corporate Roles/Functions – Plaintiffs want to understand the corporate roles of the Toyota entities and affiliates in the research testing, design, sales and/or development of the subject vehicles and document/data retention and preservation issues:
  1. TTC U.S.A.
  2. TTC Headquarters Tokyo
  3. TEMA
  4. TMC
  5. TMS
  6. TMNA, Inc.

**XII. Miscellaneous**

- A. Communications with Insurers – communications with insurers regarding potential UA incidents in subject vehicles since 1998
- B. Communications with Rental Car Companies - communications with rental car companies regarding potential UA incidents in subject vehicles since 1998

**EXHIBIT D**

**Mktg and Ad RFPs**

All DOCUMENTS, including but not limited to all advertisements, commercials and other promotional or marketing materials (radio, print, internet, and television), that refer or relate to any representations, warranties, or statements by TOYOTA regarding the quality, reliability or safety of TOYOTA vehicles from 2002 to the present.

All DOCUMENTS, including but not limited to all advertisements, commercials and other promotional or marketing materials (radio, print, internet, and television), that refer or relate to any representations, warranties, or statements by TOYOTA regarding the recall of any TOYOTA vehicles for any reason from 2002 to the present.

All DOCUMENTS, including all promotional materials, advertisements, commercials, warranties, and other marketing materials disseminated by YOU or on YOUR behalf that refer or relate to the VEHICLES from 2002 to the present.

All DOCUMENTS, but not limited to all advertisements, commercials and other promotional or marketing materials (radio, print, internet, and television in the United States and abroad) that refer, relate or respond to the floor mat problems and recall.

All DOCUMENTS, but not limited to all advertisements, commercials and other promotional or marketing materials (radio, print, internet, and television in the United States and abroad) that refer, relate or respond to the sticky pedal problems and recall.

All DOCUMENTS, but not limited to all advertisements, commercials and other promotional or marketing materials (radio, print, internet, and television in the United States and abroad) that refer, relate or respond to any electronic problems with TOYOTA vehicles from 1998 to the present.

All DOCUMENTS, including but not limited to all advertisements, commercials and other promotional or marketing materials (radio, print, internet, and television in the United States and abroad), that refer, relate or respond to the issue of SUDDEN UNINTENDED ACCELERATION in YOUR vehicles.

All DOCUMENTS, including all correspondence, communications, memoranda, email, letters, voicemail messages, text messages, and other writings, between YOU and any outside public relations firms or marketing consultants that refer or relate to SUDDEN UNINTENDED ACCELERATION or any of the other alleged problems that TOYOTA has experienced with its vehicles from 2002 through the present.

All television advertisements, commercials and other promotional or marketing materials that refer or relate to YOUR vehicles from January 1, 2002 to the present.

All radio advertisements, commercials and other promotional or marketing materials that refer or relate to YOUR vehicles from January 1, 2002 to the present.

All internet advertisements, commercials and other promotional or marketing materials that refer or relate to YOUR vehicles from January 1, 2002 to the present.

All articles, including all opinion editorial pieces that YOU have prepared or have caused to be prepared on YOUR behalf that have been published in any newspaper, journal, magazine, blog, webpage, newsletter that refer, relate or respond to any alleged problems or concerns (or to dispel governmental, public, or consumer concern) regarding the quality, safety or reliability of TOYOTA vehicles from January 1, 2002 to the present.

### Marketing Document Discovery Requests

For every vehicle with ETCS-i produce the following:

- Any and all single-model brochures for all worldwide markets in which the vehicle were sold.
- Any and all multi-model or full-model range brochures for all worldwide markets in which the vehicle were sold.
- Any and all broadcast marketing for all worldwide markets in which the vehicles were sold.
- Any and all story boards associated with broadcast marketing for all worldwide markets in which the vehicles were sold.
- Any and all print marketing for all worldwide markets in which the vehicle was sold.
- Any and all web-based marketing for all worldwide in which the vehicle was sold.
- Any and all press releases and press kits for all worldwide markets in which the vehicles were sold.
- Any and all auto show specific press releases and press kits worldwide in which the vehicles were sold.
- Any and all press materials distributed via Toyota media websites for all worldwide markets in which the vehicles were sold.
- Any and all dealer sales training materials, including books, seminars, presentations, brochures, videos, web-based documents, or any other media.

Produce the following for all worldwide markets from January 1, 2002 to current:

- Any and all marketing, including but not limited to brochures, booklets, press releases, press kits, digital media, and / or broadcast media that address Toyota's safety philosophy, policies, guidelines and / or practices.
- Any and all marketing, including but not limited to brochures, booklets, press releases, press kits, digital media, and / or broadcast media that address "Toyota in the World" and/or any corporate citizenship policies, guidelines and / or practices.
- All versions of the "The Automobile Industry - Toyota and Japan"

**Warranty/Complaints**

For all vehicles:

Any complaints regarding SUA, including documents relating to the analysis, processing and response to the complaint.

Any warranty claims regarding SUA.

Any documents involving Toyota's compliance with TREAD Act's Early Warning Requirements.

Any documents reflecting testing, investigations or analysis of any vehicle where the consumer complained of unintended acceleration.

Any communication with Toyota dealers regarding UA, floor mat problems or sticky pedals.

**Third Party's**

Any communications between Toyota and any third party regarding floor mat, sticky pedal, ETCS defects, problems, or complaints.